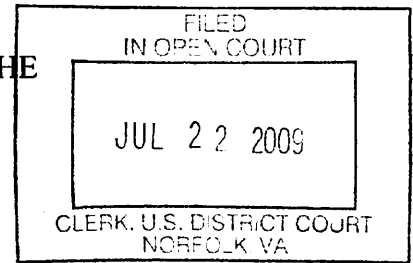


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Newport News Division



UNITED STATES OF AMERICA)	Criminal No.: 4:08cr123
)	
V.)	18 U.S.C. §§ 1951 and 2
)	Obstruct, Delay, and Affect
MICHAEL O. WATKINS)	Commerce by Robbery
(Counts 1, 2 and 3))	(Count 1)
)	
)	18 U.S.C. §§ 924(o) and 2
)	Conspiracy to Possess and Brandish
)	a Firearm in Furtherance of a Crime
)	of Violence
)	(Count 2)
)	
)	18 U.S.C. §§ 924(c) and 2
)	Possession of a Firearm
)	in Furtherance of a Crime of Violence
)	(Count 3)

SUPERSEDING INDICTMENT

JULY 2009 TERM – at Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, SOLO gas station and convenience store, located at 1255 N. King Street in Hampton, Virginia, was a gas station and convenience store business engaged in receiving and selling goods in interstate commerce, in a business that affects interstate commerce.

2. On or about July 25, 2008, at the SOLO gas station and convenience store located at 1255 N. King Street in Hampton, Virginia, in the Eastern District of Virginia, MICHAEL O. WATKINS, the defendant herein, aided and abetted by a coconspirator, did knowingly and unlawfully

obstruct, delay and affect, and attempt to obstruct, delay and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by knowingly and willfully committing robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain approximately \$1,134.69 in United States currency from the persons of, and in the presence of, Debra Sechrist and Ashok Patel against their will by means of actual and threatened force, violence and fear of injury, immediate and future, to their persons, that is, the defendant possessed and a coconspirator brandished a firearm at said employees of the SOLO gas and convenience store, and demanded and removed money from the cash register.

(In violation of Title 18, United States Code, Sections 1951(a) and 2).

COUNT TWO

From on or about July 18, 2008, up to and including July 25, 2008, in the Eastern District of Virginia, the defendant MICHAEL O. WATKINS did unlawfully, knowingly, and intentionally combine, conspire, confederate and agree together and with other co-conspirators, both known and unknown to the grand jury, to commit the following offense against the United States:

1. To knowingly and intentionally and unlawfully possess and brandish a firearm in furtherance of a crime of violence for which he may be prosecuted in a Court of the United States, as set out in Count Three of this Indictment, in violation of title 18, United States Code, Sections 924(c)(1) and 2.

WAYS, MANNERS AND MEANS OF THE CONSPIRACY

1. The primary purpose of the conspiracy was to obtain United States currency and other property through the robbery of the SOLO gas station and convenience store at 1255 N. King Street in Hampton, Virginia. The ways, manner and means by which the defendant and co-conspirators carried out the purpose of the conspiracy include but are not limited to the following:

- a. MICHAEL O. WATKINS and a co-conspirator would and did visit convenience stores to identify potential robbery targets;
- b. MICHAEL O. WATKINS arranged for an individual to drive him and a coconspirator to potential armed robbery targets including the SOLO gas station and convenience store at 1255 N. King Street in Hampton, Virginia.

Overt Acts

In furtherance of the conspiracy and in order to effect the objects thereof, the defendant and a co-conspirator committed and caused to be committed the following overt acts, among others, in the Eastern District of Virginia:

1. On or about July 25, 2008, MICHAEL O. WATKINS and a coconspirator drove to the SOLO gas station and convenience store at 1255 N. King Street in Hampton, Virginia, while armed for the purpose of robbing the SOLO gas station and convenience store.
2. On or about July 25, 2008, in Hampton, a coconspirator entered the Solo gas station and convenience store to determine whether it was suitable to rob while leaving a firearm in a vehicle.
3. On or about July 25, 2008, in Hampton, MICHAEL O. WATKINS entered the SOLO gas station and convenience store and passed a firearm to a coconspirator for the purpose of robbing the SOLO gas station and convenience store.
4. On or about July 25, 2008, in Hampton, MICHAEL O. WATKINS, restrained and pushed a clerk at the SOLO gas station and convenience store while a coconspirator brandished a weapon and removed United States currency from the cash register.

(All in violation of Title 18, United States Code, Sections 924(o) and 2)

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 25, 2008, at the SOLO gas station and convenience store at 1255 N. King Street in Hampton, Virginia, in the Eastern District of Virginia, MICHAEL O. WATKINS, aided and abetted by a coconspirator, did unlawfully and knowingly possess a firearm in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit: Interference with Commerce by Robbery, as set forth in Count One of this indictment.

(In violation of Title 18, United States Code, Sections 924(c)(1) and 2).

United States v. Michael O. Watkins

Criminal No.: 4:08cr123

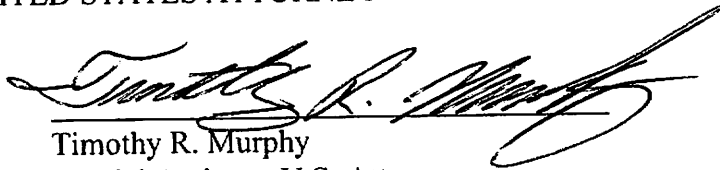
A TRUE BILL:

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FOREPERSON

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